

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Andrew Beckett, *et al.*,

No. 2:17-CV-03864-JS

Plaintiffs,

v.

Aetna, Inc., *et al.*,

Defendants.

**PLAINTIFFS' MOTION FOR ATTORNEYS' FEES, EXPENSES,
AND CLASS REPRESENTATIVE SERVICE AWARDS**

Plaintiffs, through their undersigned counsel, respectfully file this Motion for Attorneys' Fees, Expenses, and Class Representative Service Awards, requesting the Court to approve the following payments in connection with the Parties' Settlement Agreement as fair and reasonable:

- (1) attorneys' fees to Class Counsel in the amount of twenty-five percent (25%) of the Settlement Fund (\$4,290,300);
- (2) reimbursement of Class Counsel's out-of-pocket costs in the amount of \$73,892.68; and
- (3) service awards in the amount of \$5,000 to each of the seven (7) Class Representatives who filed the Complaints that were consolidated in this litigation (Andrew Beckett, S.A., John Doe, Kansas Doe, Jane Doe2, John Doe1, and John Doe2); and \$2,000 to each of the thirty (30) additional Class Representatives whose claims were alleged in Plaintiffs' Amended Class Action Complaint filed on December 5, 2017 (ECF No. 39) (Arizona Doe, California Doe, Colorado Doe, Connecticut Doe, DC Doe, Florida Doe, Georgia Doe, Illinois Doe, Indiana Doe, Maine Doe, Maryland Doe, Minnesota Doe, Mississippi Doe, Missouri Doe, Nevada Doe, NewHampshire Doe, NewJersey Doe, NewMexico Doe, NewYork Doe1, NewYork Doe2,

NewYork Doe3, NewYork Doe4, NorthCarolina Doe, Ohio Doe, Oklahoma Doe, SouthCarolina Doe, Tennessee Doe, Texas Doe, Virginia Doe, and Washington Doe).

This Motion is based on the accompanying Memorandum of Law; the Parties' Settlement Agreement, the Declarations of Class Counsel submitted herewith in support of this Motion, and all other records, pleadings and papers on file in this action.

A proposed Order is submitted for the Court's consideration.

Dated: July 17, 2018

Respectfully submitted,

/s/Shanon J. Carson
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Co-Lead Class Counsel

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served upon all counsel of record through the Court's ECF system this 17th day of July, 2018.

s/ Shanon J. Carson

Shanon J. Carson